

DISCOVERY DISPUTE CERTIFICATE

I, Christopher T. Sheean, certify that I made a reasonable effort to reach agreement with opposing counsel on the matters set forth in the attached motion. Specifically, on December 12, 2006, I contacted opposing counsel and explained the grounds for the motion. Counsel responded that Plaintiff was not willing to withdraw the supplemental report of Robert Seibel, but would allow VEO the opportunity to file a supplemental report for its liability expert. On December 13, 2005, I responded to opposing counsel, explaining that VEO is prejudiced by the timing of the supplemental report, and indicating that the report must be withdrawn by Plaintiff to avoid the prejudice. We were not able to reach an agreement, which necessitated the filing of the foregoing motion.

/s/ Christopher T. Sheean
Christopher T. Sheean